

**Tab 9 to Appendix of Exhibits to Motion of Defendant Brush Wellman, Inc. for Summary Judgment:**

**CARUOLO DECLARATION AND EXHIBITS**

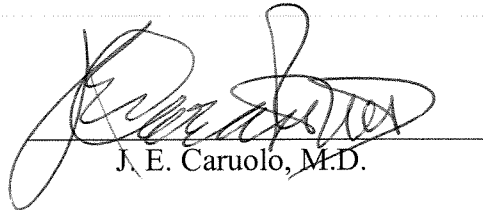
**DECLARATION OF J. E. CARUOLO, M.D.**

I, Dr. J. E. Caruolo, have knowledge of the following facts, and if called to testify could do so from personal knowledge:

1. I am a retired physician, and in 1984 I was a practicing physician, licensed by the State of Rhode Island.
2. In 1984 Suzanne Genereux was a patient of mine.
3. The document attached as Exhibit A (page numbers BW-GEN 03988 to BW-GEN 03989) is a true and accurate copy of a letter that I wrote to Dr. Antonio Machado on April 13, 1984, in connection with my treatment of Suzanne Genereux.
4. The statements contained in Exhibit A were based on my observations during my examination of Suzanne Genereux and statements made by her during that examination.
5. The document attached as Exhibit B (page number BW-GEN 03990) is a true and accurate copy of a note that I wrote to Suzanne Genereux in April 1984, in connection with my treatment of her.
6. The statements contained in Exhibit B were based on my observations during my examination of Suzanne Genereux and statements made by her during that examination.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 7/29, 2006.

  
J. E. Caruolo, M.D.

**EXHIBIT A TO Declaration of J. E. Caruolo**

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4-13-84

J. E. CARUOLO, M. D.

J. E. CARUOLO, M. D.295 ANGELL STREET  
PROVIDENCE, R. I. 02906  
PHONE 751 6560

Dr. Antonio Machado

Dear Dr. Machado:

Your patient, Mrs. Suzanne Genereaux was here today presenting with a complaint of rectal bleeding. A SIGMOIDOSCOPY to 25 cm was normal.

As I went into the history I uncovered what you probably already know, but I will summarize it here so you can compare my observations with yours.

About three years ago Mrs. G went to the RIHER with a similar complaint, was examined and released without a diagnosis or recommendations. She said they humiliated her and thats why she was reluctant to come here with the same complaint. This fact with the observation that she was weeping and sobbing and seemed to be generating her own emotional storm led me to inquire further.

First, she has a classical irritable colon syndrome.

Also, she was operated by a Woonsocket Surgeon when she was 18 for RLQ pain. She said he took out intestines, some of her ovaries, and had to open her up "in bed" for what sounds like an abdominal wall abscess. She blames him for a bad scar which he never offered to improve and also for her sterility. I really do not believe either of these assertions.

She has dyspareunia which led to two further aspects of her case. One is that she has a history of having been beaten up and ?sexually assaulted on at least one and maybe two occasions. Also, she has been seeing "lots of doctors in order to "get an answer" She has recently seen a Gynecologist who advised her to stop the pill and "agreed with her as to why she is sterile". She has seen a Neurosurgeon for headaches and is getting no satisfaction or answers. She is seeing another physician for nosebleeds. Incidentally she complained of a "lot of head injuries in the past one of which was caused by a hutch falling on her head. She feels the Beryllium she comes near at work may be "the answer". In short, there is no end to her complications in life if one permits her to go on complaining. She wants to go to the Lahey Clinic "to get the answer". She said she has seen a psychiatrist and doesn't like him. No need to say why. Thus she must be considered as a patient seriously in need of psychiatric guidance. Her husband and her father have little or no insight into her problem. I think her mother in law does not agree at all with her son and the patients father. As you know, I told her to collect any bloody stool in a Mason Jar and bring it to you or me. Until she does, and we are sure she is not malingering, I think we should go no further in diagnosis such as getting endoscopies, etc.

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J. E. CARUOLO, M. D.

J. E. CARUOLO, M. D.

295 ANGELL STREET  
PROVIDENCE, R. I. 02906  
PHONE 781 8550

Perhaps one approach is to put them in contact with a psychiatrist who may find a different approach than the one she will not return to,

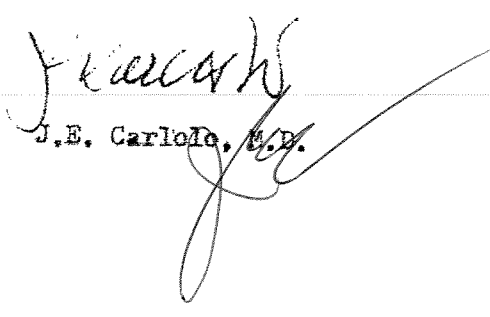
In the meantime, I said I would give them a list of instructions because I thought they should not be running to specialists for "the answer" and they should not be running to the Lahey Clinic for the answer either except under controlled circumstances. They left without the list and called later for a copy of it. I am sending you a copy.

While it is not my expertise I hope you will forgive me for going beyond the sigmoidoscopy, but I felt badly that they might be spending large sums of money and subject her to even dangerous testing to no avail.

Thank you for sending Mrs. Genereux.

Incidentally, if she shows up with a jar of blood and feces and it seems genuine she should have barium enema and colonoscopy.

Sincerely,

  
J.E. Caruolo, M.D.

**EXHIBIT B TO Declaration of J. E. Caruolo**

FROM THE DESK OF

J. E. CARUOLO, M. D.

295 ANGELL STREET

PROVIDENCE, RHODE ISLAND 02906

TELEPHONE: 751-6560  
521-2331Mrs. Jenering

1. Have confidence in Dr. Macleado.
2. Let him manage your case.
3. Do not go to specialists at The Baker Clinic as your M.D. I think Dr. M. will get specialty opinions and second opinions when he thinks necessary and also if you yourself want them.
4. I think you should start with psychiatric guidance you feel comfortable with.

4. Your body is subject to illness just like any body else but in your case your emotional tensions complicate matters. Dr. Macleado and a psychiatrist may be able to help you separate your two problems.  
Dr. C.

